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*AWAITING ADMISSION

Judge Kiyo A. Matsumoto
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Wisdom v. Perez, 1:20-cv-02196
 Request for Extension of Time to Reply

Your Honor:

I am writing to respectfully request an extension of time in which to submit a reply on behalf of Petitioner Atara Wisdom.

On August 23, 2020, the Court issued an Order to Show Cause (“OSC”) directing that Petitioner must submit any reply in this matter within 30 days of the filing of Respondent’s opposition papers. Since Respondent filed an opposition on November 12, 2020, Petitioner’s reply is currently due on December 14, 2020 (30 days would be December 12, a Saturday).

I am writing to respectfully request an extension of time of an additional 30 days in which to submit a reply. A reply is necessary due to my pre-existing workload over the next month. I have a reply due by November 30 in another matter in the Eastern District of New York. In New York state courts, there are November and December deadlines for two of my own cases and other attorneys’ cases that I am responsible for reviewing. If possible, I also hope to take some time off around Thanksgiving and late December.

No previous extension has been requested and Respondent’s counsel consented to any extension of time I might need.

I am available at (978) 886-3130 and tlinn@appad.org to answer any questions or provide more information. Thank you for your consideration.

Respectfully,


Tammy Linn
Counsel for Petitioner